

# EXHIBIT 71

HIGHLY CONFIDENTIAL  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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IN RE MATTER OF: )  
)  
THOMSON REUTERS ) C.A. No. 20-613(LPS)  
ENTERPRISE CENTRE GMBH )  
and WEST PUBLISHING )  
CORPORATION, )  
)  
Plaintiffs and )  
Counterdefendants, )  
)  
VS. )  
)  
ROSS INTELLIGENCE, )  
INC., )  
)  
Defendant and )  
Counterclaimant. )  
)

ORAL AND VIDEOTAPED DEPOSITION  
OF  
TARIQ HAFEEZ  
MAY 26, 2022

ORAL AND VIDEOTAPED DEPOSITION OF  
TARIQ HAFEEZ, produced as a witness at the  
instance of the Plaintiff and  
Counterdefendants and duly sworn, was taken in  
the above-styled and numbered cause on  
May 26, 2022, from 9:07 a.m. to 4:11 p.m.,  
before KATERI A. FLOT-DAVIS, CSR, CCR, in and  
for the State of Texas, reported by machine  
shorthand, pursuant to the Federal Rules of  
Civil Procedure and the provisions stated on  
the record herein.

A P P E A R A N C E S

FOR THE PLAINTIFF:

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Also Present:

Kimberly Villalobos, Videographer

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1 P R O C E E D I N G S

2  
3 THE VIDEOGRAPHER: We are on the  
4 record on May 26th, 2022, at 9:07 a.m.,  
5 Eastern Time, for the remote video  
6 deposition of Mr. Tariq Hafeez, in the  
7 matter of Thomson Reuters Enterprise  
8 Centre GMBH, et al., versus ROSS  
9 Intelligence, Incorporated.

10 My name is Kimberly Villalobos and  
11 I am the videographer and document tech.

12 All present will be noted on the  
13 stenographic record.

14 Will the court reporter please  
15 swear in the witness.

16 (Witness sworn.)

17 MR. SIMMONS: So let's start by  
18 getting appearances on the record.

19 I'm Joshua Simmons from Kirkland &  
20 Ellis. I represent the plaintiffs.

21 And along with me is Eric Loverro  
22 from our offices, as well.

23 MR. PARKER: Warrington Parker,  
24 representing ROSS Intelligence.

25 With me is Crinisha Berry.

1 MR. TURFE: And Tarik Turfe  
2 representing the witness, Mr. Tariq  
3 Hafeez.  
4

5 TARIQ HAFEEZ,  
6 having been first duly sworn, testified as  
7 follows:  
8

9 EXAMINATION

10 BY MR. SIMMONS:

11 Q. Mr. Hafeez, could you state your  
12 full name for the record.

13 A. Sure. My name is Tariq, middle  
14 name is Saadain, S-a-a-d-a-i-n, last name is  
15 Hafeez.

16 Q. And what is your address?

17 A. My home address or business  
18 address?

19 Q. We can start with your business  
20 address.

21 A. Sure. Business address is 2723  
22 South State Street, Suite 150, Ann Arbor,  
23 Michigan 48014.

24 Q. And do you live in Ann Arbor  
25 Michigan?



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1       There was a request for examination and  
2       signature of the witness to the deposition  
3       transcript. The original transcript was sent  
4       for review on \_\_\_\_\_ to the  
5       witness or to the attorney for the witness for  
6       examination, signature and return to me by  
7       \_\_\_\_\_;

8       I further certify that I am neither counsel  
9       for, related to, nor employed by any of the  
10      parties or attorneys in the action in which  
11      this proceeding was taken, and further that I  
12      am not financially or otherwise interested in  
13      the outcome of the action.

14      Certified to by me this \_\_\_\_ of \_\_\_\_\_  
15      , \_\_\_\_.

16  
17      

18      Kateri A. Flot-Davis  
19      Texas CSR No. 8462  
20      Expiration Date: 12-31-22

21

22

23

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